



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
25063 CENTER RIDGE ROAD  
WESTLAKE, OH 44145-4114

February 24, 2015

Mr. Steve Tink  
Marcellus Safety and Sustainability Unit Leader  
Statoil Oil & Gas, LP  
12524 Capitol Saddlery Trail  
Austin, Texas 78732

Re: Draft Work Plan for Statoil Eisenbarth Well Pad Site

Dear Mr. Tink:

On December 10, 2014, U.S. Environmental Protection Agency (U.S. EPA) submitted required revisions to the Draft Work Plan for Statoil Eisenbarth Well Pad Site. Revisions to the Draft Work Plan were submitted for review by U.S. EPA on December 23, 2014 as part of the U.S. EPA's Agency Administrative Settlement Agreement and Order on Consent for Removal Action (AOC) dated August 13, 2014.

Pursuant to Section VIII, paragraph 16-b of the AOC, the Work Plan for the Statoil Well Pad Site is hereby conditionally approved with the modifications accompanying this letter. The Work Plan shall be implemented, with modifications, in accordance with the proposed schedule.

If you have any questions or concerns, please contact me at 440-250-1744.

Sincerely,

A handwritten signature in blue ink, which appears to read "James Justice", is written over the word "Sincerely,".

James Justice  
U.S. EPA On-Scene Coordinator

**U.S. EPA Revisions to the Statoil Eisenbarth Well Pad Site  
Work Plan for Removal Actions**

**GENERAL COMMENTS/REVISIONS:**

1. Some portions of the work to be performed as part of the AOC can begin prior to the completion of any remedial activities of the Eisenbarth Well Pad as long as existing containment measures are maintained. Please note that pursuant to Section VIII, paragraph 18-c of the AOC, U.S. EPA shall be notified a minimum of 3 days before any sample collection activity.
2. U.S. EPA requests to be notified in advance of the discontinuation of containment and collection activities at the outfalls that service the Eisenbarth Well Pad.

**WORK PLAN:**

**Section 15.a.i, Proposed future actions for 15.a.i:**

1. Additional data provided to U.S. EPA following the submission of the revised Work Plan identified the presence of TTPC in subsurface soils at depth. In one case as deep as 28-30 feet below ground surface. No TTPC detections have been observed in ground water samples to date. The presence of TTPC at depth indicates that there is a possibility for migration. In order to continue to monitor for potential migration pathways off-site, U.S. EPA requests the following:
  - a. All outfalls and installed water monitoring wells be sampled quarterly for at least one year to monitor for potential subsurface migration.
  - b. The two nearest private residential wells (north and south of Well Pad) be included in this quarterly sampling.
  - c. Once groundwater direction is established and presented to U.S. EPA, additional private residential wells may be added to the quarterly monitoring.

**Section 15.a.ii, Proposed future actions for 15.a.ii:**

1. U.S. EPA requests that the 3 sampling events be conducted following the discontinuation of containment present at the outfalls serving the Eisenbarth Well Pad.
  - a. The three sampling events shall be conducted only after containment is discontinued at the outfalls.
2. Please change the Spring 2015 sampling event to Fall 2015.
3. The proposed sampling locations are acceptable with the following qualifiers/clarifications:
  - a. It is unclear by the written descriptions of the 11 sampling locations that all four of the outfalls from the Well Pad, shown on the Existing Drainage Locations Figure, are covered. Sample points PD07 and SW24 appear to cover the western outfalls. PD03 appears to possibly cover one of the outfalls south of the Well Pad but none of the locations appear to cover the 12" HDPE pipe that receives flow from the 4" underdrain along the southern edge of the Well Pad. Please

- confirm what sample points cover the two southern outfalls and add an additional point if needed.
- b. Please submit the proposed background locations on Opossum and Sunfish Creeks for review prior to the first sampling event of these and the other 11-12 locations.
4. Sampling of collection points at the outfalls should continue at least monthly until containment is discontinued.

**Section 15.a.iii, Proposed future actions for 15.a.iii:**

- 1. WET Testing:
  - a. Review of the data indicates TTPC in the collected water from the Well Pad is at similar concentrations to surface waters or non-detect, please collocate the WET sample location with SW04 selected for the WST testing.
  - b. U.S. EPA requests Chronic WET Testing be conducted as well using the procedures described in "Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, EPA-821-R-02-013" or "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, EPA-821-R-02-012."
  - c. For both the acute and chronic both no-observed-adverse-affect-levels (NOAELs) and lowest-observed-adverse-affect-levels (LOAELs) should be determined.
- 2. WST Testing:
  - a. U.S. EPA requests Chronic WST Testing be conducted as well using the *Hyalela Azteca* 42 day test for measuring the effects of sediment associated contaminants on survival, growth and reproduction and the life cycle test for measuring the effects of sediment associated contaminants on *Chironomus dilutes*. These tests should be run in accordance with "Methods for Measuring the Toxicity and Bioaccumulation of Sediment-associated Contaminants with Freshwater Invertebrates, EPA 600/R-99/064."
  - b. NOAELs and LOAELs should be determined.
- 3. Schedule:
  - a. U.S. EPA requests that WET and WST testing be conducted in 2015.